

IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA

(1) PHILIP SANDERS, an  
Individual and Husband and  
Next of Kin of BRENDA JEAN  
SANDERS, Deceased,

Plaintiff,

-vs-

No. 17-cv-492-JHP-FHM

(1) CREEK COUNTY BOARD OF  
COUNTY COMMISSIONERS, and  
(2) SHERIFF BRET BOWLING,  
in his official capacity as  
Creek County Sheriff, and  
(3) TURN KEY HEALTH CLINICS,  
a limited liability company,

Defendants.

**DEPOSITION OF NICHOLAS GROOM**

TAKEN ON BEHALF OF THE PLAINTIFF

TAKEN AT 7447 SOUTH LEWIS AVENUE

TULSA, OKLAHOMA

MAY 6, 2020

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REPORTED BY: RACHAEL A. ROPER, RPR

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EXHIBIT

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1 call someone with Turn Key when you're working?

2 were there any situations you were trained that you  
3 should contact someone at Turn Key?

4 A. Someone at Turn Key, you mean like the doctor or --

5 Q. Doctor, nurse.

6 A. -- boss?

7 Q. Yeah, boss.

8 A. I mean, it could be just any situation at all. If  
9 I was out of supplies or something I couldn't get  
10 ordered, contact my boss or, you know, I contact the  
11 physician if someone had a decline in condition or  
12 needed to be transferred out. Other times if we saw  
13 that someone was in an emergency need, we would go  
14 ahead and transfer them out before calling the  
15 doctor. Just use our discretion. Of course, we  
16 talked to the doctor every day regardless to give  
17 her a report and get any orders for any patients or  
18 new patients.

19 Q. Anything else?

20 A. There's just, I'm sure, lots of examples, but  
21 that's the general --

22 Q. Who were the different doctors that you  
23 communicated with while you were at Creek County?

24 A. There was Lela Goatley and she was the ARNP, the  
25 nurse practitioner. She was the one that came once

1 weekly and that we contacted for orders. If we  
2 couldn't contact her we called William Cooper; he is  
3 the -- I believe the medical director over all of  
4 Turn Key and he would always respond really quickly  
5 and answer us. So those were the two.

6 Q. So Goatley is a doctor?

7 A. She's a nurse practitioner, so she's able to write  
8 orders, she's able to see patients. They have their  
9 own clinics even.

10 Q. That's not my question. My question is, is Lela  
11 Goatley a doctor?

12 A. No.

13 Q. Did she ever go to medical school?

14 A. No.

15 Q. And what is it you say her license is?

16 A. Advanced registered nurse practitioner.

17 Q. Can she prescribe medications?

18 A. Yes.

19 Q. Is there a limit to what she can prescribe?

20 A. I don't have that certification, so I don't fully  
21 know. I'd imagine maybe some narcotics. I believe  
22 she has full prescribing power. You'd have to ask  
23 the physician that.

24 Q. So you believe she has a DEA number?

25 A. Yes.